

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

THE DAILY WIRE, LLC *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT
OF STATE *et al.*,

Defendants.

Civil Action No. 6:23-cv-00609-JDK

PLAINTIFFS' STATEMENT ON DISCOVERY

The Court's June 13, 2024, Preliminary Injunction Scheduling Order ("Order"), ECF No. 62, set today as a deadline for the parties to notify the Court if there were any disputes regarding Defendants' responses to Plaintiffs expedited Requests for Production and Interrogatories. After multiple conferrals Plaintiffs are pleased to report that the parties have tentatively resolved their various disagreements to an extent that Court intervention is not currently required.

While there was general disagreement related to discovery as applied to the State Department, i.e., beyond GEC, Plaintiffs are hopeful that an agreement, in principle, concerning the provision of relevant discovery, coupled with continued good faith conferrals and practices, will address any issues.

Dated: July 1, 2024

KEN PAXTON
Attorney General

BRENT WEBSTER
First Assistant Attorney General

/s/ Jenin Younes

JENIN YOUNES
Lead Attorney

NY Bar No. 5020847
NEW CIVIL LIBERTIES ALLIANCE
jenin.younes@ncla.legal

RALPH MOLINA

Deputy Attorney General for Legal Strategy

RYAN D. WALTERS

Chief, Special Litigation Division

/s/ Susanna Dokupil (by permission)

SUSANNA DOKUPIL

Attorney in Charge

Special Counsel

Texas Bar No. 24034419

JONATHAN STONE

Special Counsel

Texas Bar No. 24071779

AMY HILTON

Special Counsel

Texas Bar No. 24097834

JACOB E. PRZADA

Special Counsel

Texas Bar No. 24125371

OFFICE OF THE ATTORNEY GENERAL OF TEXAS

Special Litigation Division

P.O. Box 12548, Capitol Station

Austin, Texas 78711-2548

Tel.: (512) 463-2100

susanna.dokupil@oag.texas.gov

jonathan.stone@oag.texas.gov

amy.hilton@oag.texas.gov

jacob.przada@oag.texas.gov

Counsel for the State of Texas

MARGOT J. CLEVELAND

Michigan Bar No. 83564

NEW CIVIL LIBERTIES ALLIANCE

margot.cleveland@ncla.legal

ZHONETTE M. BROWN

D.C. Bar No. 463407

NEW CIVIL LIBERTIES ALLIANCE

zhonette.brown@ncla.legal

MARGARET A. LITTLE

Connecticut Bar No. 303494

peggy.little@ncla.legal

NEW CIVIL LIBERTIES ALLIANCE

1225 19th Street NW, Suite 450

Washington, DC 20036

Tel.: (202) 869-5210

*Counsel for Plaintiffs The Daily Wire
Entertainment LLC and FDRLST Media LLC*

CERTIFICATE OF SERVICE

On July 1, 2024, I electronically submitted this document to the clerk of the court of the U.S. District Court for the Eastern District of Texas using the court's electronic case filing system. I certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Margot J. Cleveland